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PROPOSED ATTORNEYS FOR DEBTORS

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: § Chapter 11
ERG Intermediate Holdings, LLC, *et al.*,¹ § Joint Administration Pending
Debtors. § Case No.:

NOTICE OF DESIGNATION AS COMPLEX CHAPTER 11 BANKRUPTCY CASES

On April 30, 2015, ERG Intermediate Holdings, LLC; ERG Resources, L.L.C.; West Cat Canyon, L.L.C.; ERG Interests, LLC; and ERG Operating Company, LLC (collectively, the "Debtors") each filed a petition for relief under chapter 11, title 11 of the United States Code. These cases qualify as complex Chapter 11 cases because:

1. The Debtors in the above-captioned cases have total debt of more than \$10 million;
2. There are more than 50 parties-in-interest in these cases; and
3. The Debtors are proposing a sale of substantially all their assets.

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (7946). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

Dated: April 30, 2015
Dallas, Texas

Respectfully submitted,

/s/ Tom A. Howley

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